

STATE OF FLORIDA AUDITOR GENERAL

Operational Audit

Report No. 2019-094
January 2019

**SUWANNEE COUNTY
DISTRICT SCHOOL BOARD**



Sherrill F. Norman, CPA
Auditor General

Board Members and Superintendent

During the 2017-18 fiscal year, Ted L. Roush served as Superintendent of the Suwannee County Schools and the following individuals served as School Board Members:

	<u>District No.</u>
Jerry Taylor, Chair	1
Catherine Cason	2
Tim Alcorn	3
Ed daSilva, Vice Chair	4
Ronald White	5

The team leader was Tiffany R. Stewart, CPA, and the audit was supervised by Glenda K. Hart, CPA.

Please address inquiries regarding this report to Micah E. Rodgers, CPA, Audit Manager, by e-mail at micahrodgers@aud.state.fl.us or by telephone at (850) 412-2905.

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SUWANNEE COUNTY DISTRICT SCHOOL BOARD

SUMMARY

This operational audit of the Suwannee County School District (District) focused on selected District processes and administrative activities and included a follow-up on findings noted in our report No. 2016-162. Our operational audit disclosed the following:

Finding 1: Contrary to State law, District school advisory councils (SACs) did not always adopt bylaws establishing procedures for scheduling meetings, give reasonable notice of public meetings, hold regular meetings, or promptly record minutes of SAC meetings and make the minutes open for public inspection.

Finding 2: Required background screenings were not always performed for applicable instructional and noninstructional employees and contractor workers.

Finding 3: District controls continue to need strengthening to ensure accurate reporting of instructional contact hours for adult general education classes to the Florida Department of Education.

Finding 4: Some unnecessary information technology user access privileges existed that increased the risk that unauthorized disclosure of sensitive personal information of students may occur.

Finding 5: District security controls related to logging and monitoring of key system activity and security events need improvement.

BACKGROUND

The Suwannee County School District (District) is part of the State system of public education under the general direction of the Florida Department of Education and is governed by State law and State Board of Education rules. Geographic boundaries of the District correspond with those of Suwannee County. The governing body of the District is the Suwannee County District School Board (Board), which is composed of five elected members. The elected Superintendent of Schools is the Executive Officer of the Board. During the 2017-18 fiscal year, the District operated 9 elementary, middle, high, and specialized schools and reported 5,937 unweighted full-time equivalent students.

FINDINGS AND RECOMMENDATIONS

Finding 1: Sunshine Law – School Advisory Councils

State law¹ requires that reasonable notice of public meetings be given and minutes of public meetings be promptly recorded and open for public inspection. Pursuant to State law,² the Board established a school advisory council (SAC) for each of the District's nine schools. State law³ requires SACs to adopt bylaws establishing procedures for scheduling meetings when parents, students, and other members of

¹ Section 286.011(1) and (2), Florida Statutes.

² Section 1001.452, Florida Statutes.

³ Section 1001.452(1)(d), Florida Statutes.

the community can attend and to record minutes of the meetings. Board policies⁴ provide that the SACs are subject to State law and require the SACs to hold regular meetings open to the public and advertise to the school community the agenda of each upcoming meeting. According to District personnel, SACs notify the public of meetings through District internal applications, school newsletters, school Web sites, and school calendars.

To evaluate District compliance with the statutory requirements, we requested for examination District records related to the SACs and SAC meetings held for the nine schools during the period July 2017 to March 2018. As shown in Table 1, our examination of District records and discussions with District personnel relating to the SACs at Branford Elementary School (BES), Branford High School (BHS), Suwannee Elementary School (SES), Suwannee Primary School (SPS), Suwannee Intermediate School (SIS), Suwannee Middle School (SMS), Suwannee High School (SHS), Suwannee Virtual School (SVS), and RiverOak Technical College (RTC) disclosed that the SACs did not always comply with State law and Board policies.

**Table 1
Summary of SAC Noncompliance by School**

	BES	BHS	SES	SPS	SIS	SMS	SHS	SVS	RTC
SAC had not adopted bylaws					✓			✓	
SAC bylaws did not establish procedures for scheduling meetings	✓	✓					✓		✓
Evidence of public notice of all SAC meetings not provided ^a		✓		✓	✓	✓	✓		✓
Minutes of all SAC meetings not available ^b		✓			✓		✓		
No SAC meetings held								✓	

^a Evidence of public notice was not provided for 17 of the 23 meetings held by these six SACs.

^b Minutes were not available for 4 of the 11 meetings held by these three SACs.

In response to our inquiry, District personnel indicated that employees had not been properly trained to comply with all statutory SAC requirements and that District procedures did not require or ensure that SACs adopt bylaws establishing procedures for scheduling meetings, promptly recording minutes of those meetings, or making the minutes available for public inspection.

Absent effective procedures to require and ensure District compliance with statutory SAC requirements, there is an increased risk that SACs may not hold the required meetings or properly inform the public of SAC activities.

Recommendation: The District should comply with the statutory SAC requirements by ensuring that SACs adopt bylaws establishing procedures for scheduling meetings, give reasonable notice of public meetings, hold regular meetings, promptly record minutes of SAC meetings, and make the minutes open for public inspection. Appropriate training of SAC members would promote compliance with statutory SAC requirements by helping members understand those requirements.

⁴ Board Policy No. 2.04 – School Advisory Councils.

Finding 2: Background Screenings

State law⁵ requires that each person hired or contracted to serve in an instructional or noninstructional capacity who are permitted access on school grounds when students are present or who have direct contact with students must undergo a level 2 background screening⁶ at least once every 5 years. State law⁷ also provides that noninstructional contractors may be exempt from the background screening requirements if the contractors are under the direct supervision of a school district employee or contractor who has had a criminal history check and meets the statutory background screening requirements. Additionally, for noninstructional contractors, State law⁸ requires the District to verify the results of the contractor's background screening using the Florida Shared School Results (FSSR) system implemented by the Florida Department of Law Enforcement (FDLE).

According to District personnel, the Human Resource (HR) Department is responsible for ensuring that employees and contractor workers who have access to school grounds undergo required background screenings at least once every 5 years. The HR Department generates a report monthly of all employees screened within the last 5 years and the District identifies the employees who are due for rescreening.

The District typically issues a District badge to contractor workers unless the contractor worker was already fingerprinted in another Florida school district and issued a Florida Public School Contractors' badge that includes the contractor's picture and badge expiration date. According to District personnel, the District did not maintain a comprehensive list of contractor workers to monitor background screenings but relied on the contractor procedures to ensure the required screenings were obtained and evaluated at least once every 5 years. However, District reliance on the contractor screening process provides limited assurance as to the effectiveness of that process.

As of February 2018, the District employed 393 instructional and 467 noninstructional personnel and, as of March 2018, the District had six contractors with 88 contractor workers who were not exempt from background screening requirements and were permitted access on school grounds when students were present or had direct contact with students. To determine whether the required background screenings were performed, we requested for examination District records for all 88 contractor workers and 30 selected employees and found that:

- For one contractor, District records evidenced background screenings for 48 of the contractor's 83 workers; however, the District did not verify that the required background screenings were performed for 35 of the workers because District procedures had not been established to consistently verify this information. In response to our inquiry, District personnel indicated that, for this contractor, the District primarily relied on the contractor to obtain and monitor contractor worker screenings.

Subsequent to our inquiry, in September 2018 District personnel obtained evidence from the FSSR system that 29 of the 35 contractor workers had received a background screening in the past 5 years and obtained screenings for the 6 contractor worker who were not listed in the FSSR

⁵ Sections 1012.32, 1012.56(10), and 1012.465, Florida Statutes.

⁶ A level 2 background screening includes fingerprinting for Statewide criminal history records checks through the FDLE and national criminal history records checks through the Federal Bureau of Investigation.

⁷ Section 1012.468, Florida Statutes.

⁸ Section 1012.467(2)(f), Florida Statutes.

system. The screening results for the 35 contractor workers did not disclose any unsuitable backgrounds.

- The required background screenings had not been performed at least once in the past 5 years for 2 instructional employees and 1 noninstructional employee. As of March 2018, 5 years and 8 months had elapsed since the 3 employees' most recent background screenings. Subsequent to our inquiry, in March 2018 District personnel performed background screenings for the 3 employees and no unsuitable backgrounds were noted.
- Background screenings were on file for 2 other noninstructional employees; however, the screenings were performed 2 and 8 months, respectively, after the required 5-year period had elapsed.

In response to our inquiry, District personnel indicated that background screenings were not always performed timely due to staff transitions in the HR Department. Absent effective controls to ensure that required background screenings are timely performed, there is an increased risk that individuals with unsuitable backgrounds may be allowed access to students.

Recommendation: The District should take immediate action to identify contractor workers and employees who have not obtained the required background screenings; ensure screenings are promptly obtained, documented, and evaluated; and make decisions as necessary, based on evaluations of the screenings. To help monitor and ensure that required background screenings are performed at least once every 5 years, we recommend that the District establish a comprehensive, up-to-date list of contractor workers subject to background screenings.

Finding 3: Adult General Education Classes

State law⁹ defines adult general education, in part, as comprehensive instructional programs designed to improve the employability of the State's workforce. The District received State funding for adult general education, and General Appropriations Act¹⁰ proviso language requires each school district to report enrollment for adult general education programs in accordance with Florida Department of Education (FDOE) instructional hours reporting procedures.¹¹ State Board of Education (SBE) rules¹² require the District to collect and maintain enrollment and attendance information on students based on minimum enrollment requirements for funding and mandatory withdrawal procedures for students for non-attendance. A minimum enrollment threshold of 12 hours of attendance for each program must be met before a student can be counted for funding purposes. Instructional contact hours are reported up to and including the last date of attendance but should not include any instructional contact hours reported for any period beyond the last date of actual attendance.

The District reported 7,050 instructional contact hours provided to 117 students enrolled in 7 courses for the Fall 2017 Semester. As part of our audit, we requested for examination District records supporting 1,302 contact hours reported for 25 students enrolled in 5 adult general education courses. We found that instructional contact hours were under reported a net total of 229 hours, including 350 under-reported hours (ranging from 1 to 68 hours) for 18 students and 121 over-reported hours (ranging from 8 to 57 hours) for 6 students.

⁹ Section 1004.02(3), Florida Statutes.

¹⁰ Chapter 2017-70, Laws of Florida, Specific Appropriation 122.

¹¹ FDOE-issued Technical Assistance Paper, August 2017, *Adult General Education Instructional Hours Reporting Procedures*.

¹² SBE Rule 6A-10.0381(5), Florida Administrative Code.

In response to our inquiry, District personnel indicated that the misreported hours occurred primarily because occasionally revised reporting instructions were misunderstood, student attendance was inaccurately entered in the student information system, and instructors overlooked the amended Fall Semester dates due to storm closures. Since funding is based, in part, on enrollment data reported to the FDOE, it is important that the District report accurate data. A similar finding was noted in our report No. 2016-162.

Recommendation: The District should strengthen controls to ensure instructional contact hours for adult general education classes are accurately reported to the FDOE. The District should also determine the extent of the adult general education hours misreported for the Fall 2017 Semester and contact FDOE for proper resolution.

Finding 4: Information Technology - User Access Privileges

The Legislature has recognized in State law¹³ that social security numbers (SSNs) can be used to acquire sensitive personal information, the release of which could result in fraud against individuals or cause other financial or personal harm. Therefore, public entities are required to provide extra care in maintaining the confidential status of such information. Effective controls restrict individuals from accessing information unnecessary for their assigned job responsibilities and provide for documented, periodic evaluations of information technology (IT) user access privileges to help prevent individuals from accessing sensitive personal information inconsistent with their responsibilities.

Pursuant to State law,¹⁴ the District identified each student using a Florida education identification number assigned by the FDOE. However, student SSNs are included in the student records maintained within the District management information system (MIS).¹⁵ Student SSNs are maintained in the District MIS to, for example, register newly enrolled students and transmit that information to the FDOE through a secure-file procedure and provide student transcripts to colleges, universities, and potential employers based on student-authorized requests. Board policies¹⁶ allow designated District school personnel access to student records to perform administrative, supervisory, or instructional responsibilities that serve a legitimate educational purpose in accordance with applicable State law, SBE rules, and Federal laws, and District employees are required to certify that they will comply with these requirements.

As of June 2018, the District MIS contained information for 49,298 former and 7,208 current District students and 71 District employees had IT user access privileges to the sensitive personal information of students. District personnel indicated that periodic evaluations of IT user access privileges to the sensitive personal information of students are performed to help monitor these privileges; however, although we requested, District records were not provided to evidence that such evaluations had been performed. Subsequent to our inquiry, in June 2018 the District performed and documented an evaluation of IT user access privileges.

As part of our audit procedures, we observed various MIS reports showing District employee access privileges and requested District personnel to confirm that the 71 employees with user access privileges

¹³ Section 119.071(5)(a), Florida Statutes.

¹⁴ Section 1008.386, Florida Statutes.

¹⁵ The Panhandle Area Educational Consortium (PAEC) provides student records data processing services for the District and maintains student information, including SSNs, in the District MIS.

¹⁶ Board Policy 5.19, Student Records.

to the sensitive personal information of students had a demonstrated need for continuous access to perform their assigned responsibilities. Our observations and District personnel responses disclosed that 47 of the 71 employees did not need continuous access to the information. The 47 employees with unnecessary IT access privileges included school administrators, teachers, guidance counselors, and support staff. Subsequent to our procedures, in June 2018 District personnel removed the access privileges for the 47 employees.

The existence of unnecessary access privileges increases the risk of unauthorized disclosure of sensitive personal information and the possibility that such information may be used to commit a fraud against current District students or others.

Recommendation: The District should continue efforts to ensure that only those employees who have a demonstrated need for continuous access to sensitive personal student information have such access. Such efforts should include documented, periodic evaluations of assigned IT user access privileges to determine whether such privileges are necessary and the timely removal of any inappropriate or unnecessary access privileges detected. If an individual only requires occasional access to sensitive personal student information, the privileges should be granted only for the time needed.

Finding 5: Logging and Monitoring of Key System Activity and Security Events

Security controls are intended to protect the confidentiality, integrity, and availability of data and IT resources. Our audit disclosed that certain District IT security controls related to logging and monitoring of key system activity and security events need improvement. We are not disclosing specific details of the issues in this report to avoid the possibility of compromising District data and IT resources. However, we have notified appropriate District management of the specific issues.

Without adequate security controls related to logging and monitoring of key system activity and security events, the risk is increased that the confidentiality, integrity, and availability of District data and IT resources may be compromised.

Recommendation: To ensure the continued confidentiality, integrity, and availability of District data and IT resources, the District should improve security controls related to logging and monitoring of key system activity and security events.

PRIOR AUDIT FOLLOW-UP

Except as noted in Finding 3, the District had taken corrective actions for the findings included in our report No. 2016-162.

OBJECTIVES, SCOPE, AND METHODOLOGY

The Auditor General conducts operational audits of governmental entities to provide the Legislature, Florida's citizens, public entity management, and other stakeholders unbiased, timely, and relevant information for use in promoting government accountability and stewardship and improving government operations.

We conducted this operational audit from March 2018 to September 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The objectives of this operational audit were to:

- Evaluate management's performance in establishing and maintaining internal controls, including controls designed to prevent and detect fraud, waste, and abuse, and in administering assigned responsibilities in accordance with applicable laws, rules, regulations, contracts, grant agreements, and other guidelines.
- Examine internal controls designed and placed in operation to promote and encourage the achievement of management's control objectives in the categories of compliance, economic and efficient operations, reliability of records and reports, and safeguarding of assets, and identify weaknesses in those controls.
- Determine whether management had taken corrective actions for findings included in our report No. 2016-162.
- Identify statutory and fiscal changes that may be recommended to the Legislature pursuant to Section 11.45(7)(h), Florida Statutes.

This audit was designed to identify, for those programs, activities, or functions included within the scope of the audit, weaknesses in management's internal controls, instances of noncompliance with applicable laws, rules, regulations, contracts, grant agreements, and other guidelines; and instances of inefficient or ineffective operational policies, procedures, or practices. The focus of this audit was to identify problems so that they may be corrected in such a way as to improve government accountability and efficiency and the stewardship of management. Professional judgment has been used in determining significance and audit risk and in selecting the particular transactions, legal compliance matters, records, and controls considered.

As described in more detail below, for those programs, activities, and functions included within the scope of our audit, our audit work included, but was not limited to, communicating to management and those charged with governance the scope, objectives, timing, overall methodology, and reporting of our audit; obtaining an understanding of the program, activity, or function; exercising professional judgment in considering significance and audit risk in the design and execution of the research, interviews, tests, analyses, and other procedures included in the audit methodology; obtaining reasonable assurance of the overall sufficiency and appropriateness of the evidence gathered in support of our audit findings and conclusions; and reporting on the results of the audit as required by governing laws and auditing standards.

Our audit included transactions, as well as events and conditions, occurring during the 2017-18 fiscal year audit period, and selected District actions taken prior and subsequent thereto. Unless otherwise indicated in this report, these records and transactions were not selected with the intent of statistically projecting the results, although we have presented for perspective, where practicable, information concerning relevant population value or size and quantifications relative to the items selected for examination.

An audit by its nature does not include a review of all records and actions of management, staff, and vendors, and as a consequence, cannot be relied upon to identify all instances of noncompliance, fraud, waste, abuse, or inefficiency.

In conducting our audit, we:

- Reviewed District information technology (IT) policies and procedures to determine whether the policies and procedures addressed certain important IT control functions, such as security, systems development and maintenance, network configuration management, system backups, and disaster recovery.
- Evaluated District procedures for maintaining and reviewing employee access to IT data and resources. We examined selected access privileges to the District's enterprise resource planning (ERP) system finance and human resources (HR) applications to determine the appropriateness and necessity of the access based on employees' job duties and user account functions and whether the access prevented the performance of incompatible duties. We also examined the administrator account access privileges granted and procedures for oversight of administrative accounts for the network and applications to determine whether these accounts had been appropriately assigned and managed. Specifically, we:
 - Tested the 10 roles that allowed update access privileges to selected critical ERP system finance application functions resulting in the review of the appropriateness of access privileges granted for 8 accounts.
 - Tested the 12 roles that allowed update access privileges to selected critical ERP system HR application functions resulting in the review of the appropriateness of access privileges granted for 5 accounts.
- Reviewed District procedures to prohibit former employee access to electronic data files. We also reviewed access user privileges for 42 employees who separated from District employment during the audit period to determine whether the access privileges had been timely deactivated.
- Determined whether a comprehensive IT disaster recovery plan was in place, designed properly, operating effectively, and had been recently tested.
- Examined selected operating system, database, network, and application security settings to determine whether authentication controls were configured and enforced in accordance with IT best practices.
- Determined whether a comprehensive, written IT risk assessment had been developed to document the District's risk management and assessment processes and security controls intended to protect the confidentiality, integrity, and availability of data and IT resources.
- Determined whether an adequate, comprehensive IT security awareness and training program was in place.
- Evaluated Board policies and District procedures and examined supporting documentation to determine whether audit logging and monitoring controls were configured in accordance with IT best practices.
- Reviewed District guidelines for use of computing resources to determine whether the guidelines included appropriate controls, as applicable, over instant messaging.
- Evaluated the adequacy of District procedures related to security incident response and reporting.
- Evaluated the District data center's physical access controls to determine whether vulnerabilities existed.
- Examined Board, committee, and advisory board meeting minutes to determine whether Board approval was obtained for policies and procedures in effect during the audit period and for

evidence of compliance with Sunshine Law requirements (i.e., proper notice of meetings, meetings readily accessible to the public, and properly maintained meeting minutes).

- Analyzed the District's General Fund total unassigned and assigned fund balances at June 30, 2018, to determine whether the total was less than 3 percent of the fund's revenues, as specified in Section 1011.051, Florida Statutes. We also performed analytical procedures to evaluate the District's ability to make future debt service payments.
- From the population of expenditures totaling \$1.3 million and transfers totaling \$149,000 for the period July 1, 2017, through May 9, 2018, from nonvoted capital outlay tax levy proceeds, Public Education Capital Outlay funds, and other restricted capital project funds, examined documentation supporting selected expenditures and transfers totaling \$1 million and \$149,000, respectively, to determine compliance with the restrictions imposed on the use of these resources.
- From the population of \$1.1 million total workforce education program expenditures for the period July 1, 2017, through April 13, 2018, selected 30 expenditures totaling \$66,212 and examined supporting documentation to determine whether the District used the funds for authorized purposes (i.e., not used to support K-12 programs or District K-12 administrative costs).
- From the population of 51 industry certifications eligible for the 2016-17 fiscal year performance funding, examined 20 selected certifications to determine whether the District maintained documentation for student attainment of the industry certifications.
- From the population of 7,050 contact hours for 117 adult general education instructional students for the Fall 2017 Semester, examined District records supporting 1,302 reported contact hours for 25 selected students to determine whether the District reported the instructional contact hours in accordance with State Board of Education (SBE) Rule 6A 10.0381, Florida Administrative Code (FAC).
- Evaluated District procedures for protecting the sensitive personal information of students, including student social security numbers. Specifically, we examined the access privileges of the 71 individuals who had access to sensitive personal student information to evaluate the appropriateness and necessity of the access privileges based on the employee's assigned job responsibilities.
- Examined the District Web site to determine whether the 2017-18 fiscal year proposed, tentative, and official budgets were prominently posted pursuant to Section 1011.035(2), Florida Statutes.
- Examined District records to determine whether the required internal funds audit for the 2016-17 fiscal year was timely performed pursuant to SBE Rule 6A 1.087, FAC, and Chapter 8 – School Internal Funds, *Financial and Program Cost Accounting and Reporting for Florida Schools* (Red Book), and whether the audit report was presented to the Board.
- Examined District records to determine whether the District had made any payments, transfers, or loans to its direct-support organization.
- From the compensation payments totaling \$30 million to 877 employees for the period July 2017 through March 2018, examined District records supporting compensation payments totaling \$59,931 to 31 selected employees to determine whether the rate of pay was accurate and supervisory personnel reviewed and approved reports of time worked.
- Examined District records for the audit period to determine whether the District had developed adequate performance assessment procedures for instructional personnel and school administrators based on student performance and other criteria in accordance with Section 1012.34(3), Florida Statutes, and determined whether a portion of compensation was based on performance in accordance with Section 1012.22(1)(c)4., Florida Statutes, for 18 applicable personnel included in our compensation testing.

- Requested for examination District records as of February 2018 for 30 employees selected from the population of 860 employees to assess whether personnel who had direct contact with students were subjected to the required fingerprinting and background screening.
- Requested for examination District records as of March 2018 for 88 contractor workers who worked for six contractors to assess whether the workers who had access to school grounds or direct contact with students were subjected to the required fingerprinting and background screening.
- Examined Board policies, District procedures, and related records for volunteers approved for the period July 1, 2017, through March 12, 2018, to determine whether the District searched prospective volunteers' names against the Dru Sjodin National Sexual Offender Public Web site maintained by the United States Department of Justice, as required by Section 943.04351, Florida Statutes, and tested documentation related to 30 of the 1,132 approved volunteers.
- Examined District records supporting the eligibility of 30 selected District recipients of the Florida Best and Brightest Teacher Scholarship Program awards from the population of 328 District teachers who received scholarship awards totaling \$492,400 during the audit period.
- Evaluated the District procedures to implement the Florida Best and Brightest Principal Scholarship Program pursuant to Section 1012.732, Florida Statutes. We also examined District records to determine whether the District submitted to the Florida Department of Education accurate information about the number of classroom teachers and the list of principals, as required by Section 1012.731(4), Florida Statutes, and whether the District timely awarded the correct amount to each eligible principal.
- Evaluated Board policies and District procedures to ensure health insurance was provided only to eligible employees, retirees, and dependents and that, upon an employee's separation from District employment, insurance benefits were timely canceled as appropriate based on District procedures. We also determined whether the District had procedures for reconciling health insurance costs to employee, retiree, and Board-approved contributions.
- From the population of nine payments totaling \$735 paid to employees for other than travel and payroll payments during the audit period, examined documentation for all payments to determine whether such payments were reasonable, adequately supported, for valid District purposes, and were not contrary to Section 112.313, Florida Statutes.
- Reviewed District procedures for bidding and purchasing health insurance to determine compliance with Section 112.08, Florida Statutes. We also reviewed procedures for the reasonableness of procedures for acquiring other types of commercial insurance to determine whether the basis for selecting insurance carriers was documented in District records and conformed to good business practices.
- For the administrative building construction project, examined District records to determine whether architects were properly selected and adequately insured.
- Examined copies of the most recent annual fire safety, casualty safety, and sanitation inspection reports. From the eight inspection reports, we selected 139 noted deficiencies and examined District documentation to determine whether timely action was taken to correct the deficiencies.
- From the population of purchasing card (P-card) transactions totaling \$200,575 for the period July 2017 through March 2018, examined documentation supporting 30 selected transactions totaling \$18,901 to determine whether P-cards were administered in accordance with Board policies and District procedures. We also determined whether the District timely canceled the P-cards for one cardholder who separated from District employment and one cardholder who transferred to a different position during the audit period.
- Evaluated District procedures for allocating Title I funds to ensure compliance with Section 1011.69(5), Florida Statutes. We examined District records to determine whether the

District identified eligible schools, limited Title I allocations to eligible schools based on the threshold established by the District for the 2016-17 school year or the Statewide percentage of economically disadvantaged student and distributed all remaining funds to all eligible schools in accordance with Federal law and regulations.

- Examined District records and evaluated construction planning processes for the audit period to determine whether processes were comprehensive, included consideration of restricted resources and other alternatives to ensure the most economical and effective approach, and met District short-term and long-term needs.
- Evaluated District procedures for identifying facility maintenance needs and establishing resources to address those needs. We also compared maintenance plans with needs identified in safety inspection reports, reviewed inspection reports for compliance with Federal and State inspection requirements, evaluated District efforts to timely resolve any deficiencies identified during inspections, and tested the work order system for appropriate tracking of maintenance jobs.
- Determined whether non-compensation expenditures were reasonable; correctly recorded; adequately documented; for a valid District purpose; properly authorized and approved; in compliance with applicable State laws, rules, contract terms and Board policies; and applicable vendors were properly selected. From the population of non-compensation expenditures totaling \$2.6 million for the period July 2017 through May 2018, we examined District records supporting 30 selected payments for general expenditures totaling \$94,995.
- From the population of 83 contracts totaling \$1.6 million for the period July 2017 to March 2018, examined supporting documentation, including the contract documents, for 30 selected payments totaling \$215,550 related to 30 contracts to determine whether:
 - The District complied with competitive selection requirements.
 - The contracts clearly specified deliverables, time frames, documentation requirements, and compensation.
 - District records documented satisfactory receipt of deliverables before payments were made.
 - The payments complied with contract provisions.
- Communicated on an interim basis with applicable officials to ensure the timely resolution of issues involving controls and noncompliance.
- Performed various other auditing procedures, including analytical procedures, as necessary, to accomplish the objectives of the audit.
- Prepared and submitted for management response the findings and recommendations that are included in this report and which describe the matters requiring corrective actions. Management's response is included in this report under the heading **MANAGEMENT'S RESPONSE**.

AUTHORITY

Pursuant to the provisions of Section 11.45, Florida Statutes, I have directed that this report be prepared to present the results of our operational audit.



Sherrill F. Norman, CPA
Auditor General

MANAGEMENT'S RESPONSE

SUWANNEE COUNTY SCHOOL DISTRICT



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TED L. ROUSH
Superintendent of Schools

"Suwannee County School District will be a system of excellence ensuring all students are prepared for personal success."

JERRY TAYLOR
DISTRICT 1

CATHERINE CASON
DISTRICT 2

TIM ALCORN
DISTRICT 3

ED DA SILVA
DISTRICT 4

RONALD WHITE
DISTRICT 5

LEONARD J. DIETZEN, III
BOARD ATTORNEY

December 21, 2018

Ms. Sherrill F. Norman, CPA
Auditor General
State of Florida
G74 Claude Pepper Building
111 West Madison Street
Tallahassee, FL 32399-1450

Dear Ms. Norman:

Pursuant to the provisions of Section 11.45(4)(d), Florida Statutes, we are providing this response to the finding cited in the operational audit of the Suwannee County District School Board for the fiscal year ending June 30, 2018.

Finding No. 1: Sunshine Law – School Advisory Councils

In response to the deficiencies identified by this finding, the District has initiated changes that will provide for future compliance. All school administrators have received training on the School Advisory Council (SAC) requirements. Because statute allows for small districts to meet the SAC requirements with a District Advisory Council, the District will establish this group to provide for compliance.

Finding No. 2: Background Screenings

In response to the deficiencies identified by this finding, the District will implement procedures to immediately identify contractor workers and employees who have not submitted to the required background screenings. The District will continue to monitor on a regular basis to ensure that certain background screenings are obtained, documented, and evaluated in a timely manner. In order to ensure that the required background screenings are performed at least once every 5 years, the Human Resources Department will develop and maintain a complete and current list of contractor workers subject to background screenings.

*A Fully Accredited School System – SACS CASI, an Accrediting Division of AdvancED
Equal Opportunity Employer*

Finding No. 3: Adult General Education Classes

In response to the deficiencies identified by this finding, the District will require instructors of Adult Basic Education, General Education Development, and Integrated English Literacy/Civics Education to utilize "Monthly Long Sheets" for attendance purposes and to assist with review of individual student attendance. Instructors will be responsible for turning in long sheets monthly and the administrative team will review for accuracy on a monthly basis. A separate database will also collect attendance and pre/post assessment data to assist in tracking data accurately. Attendance policies and procedures will continue to be reiterated, as well as, other pertinent information with instructors and adult general education staff. Adult general education faculty and staff are supplied with an updated policy/procedure manual yearly and are provided instruction on new and continuing procedures to ensure accuracy.

Finding No. 4: Information Technology – User Access Privileges

The District will implement procedures and continue efforts to ensure that only those employees who have demonstrated the need for continuous access to sensitive personal information have access. Documented, periodic evaluations of assigned IT user access privileges will be used to determine necessity of access. Removal of any inappropriate or unnecessary access privileges will be completed in a timely manner when detected by this evaluation.

Finding No. 5: Logging and Monitoring of Key System Activity and Security Events

The District will develop and implement procedures to improve security controls related to logging and monitoring key system activity to ensure the confidentiality, integrity and availability of District data and IT resources.

The Suwannee County District School Board accepts your comments and recommendation with regard to its fiscal year 2017-2018 operational audit report in a positive and constructive manner. The recommendation will be reviewed and corrective action implemented during the current fiscal year.

Sincerely,



Ted L. Roush
Superintendent of Schools

TLR/vmd